

The content of this petition is completely without merit, and should not be used as the basis for any rulemaking.

Applicants for amateur licensing that include HF privileges must continue to include Morse code testing unless the Commission is prepared to eliminate CW as an available mode to new licensees. If the license includes a privilege (to operate CW) then how can an applicant not be tested for proficiency in its use?

The argument in this petition seems to be that Morse code is an "old" technology that is seldom used and therefore it is "unfair" for applicants to have to be tested for something that "most of them never use after passing the test".

If this is a legitimate argument for elimination of Morse testing, then couldn't an applicant also say that they don't want to take a written test that includes questions about repeaters if they don't plan to use repeaters? Or perhaps eliminate questions pertaining to satellite and space communication if they don't intend to ever use those unique and expensive methods of communication?

Of course this is not the way we conduct amateur radio license testing.

The testing pool for an amateur exam covers all aspects of the privileges provided by a specific class of license. It does not matter that an applicant only intends to use one particular mode or set of privileges; that applicant must prove some knowledge and proficiency in all of the modes which will be available for the class of license requested.

In the case of satellite communication, the applicant must rely on rote memorization to know the "modes" of possible operation (ie Mode-B, Mode-JA, Mode-A, etc.). There is no mathematical formula to get an answer for this question. It requires simple memorization.

Sub-element E1E of the Amateur Extra Class includes no less than 15 questions about the Amateur Satellite Service. None of the questions in that pool can be determined by mathematical formula or calculation. They require rote memorization in order to successfully pass that element of testing. Those who created this question pool obviously did not see this as an "unfair" method of testing an applicant's proficiency in this area of amateur operation despite the fact that amateur satellite operation is only a tiny subset of the amateur service and most licensees have never used this mode of communication.

Morse testing is similar, and should remain so.

Proficiency in using CW as a mode requires learning the Morse code. It is without merit to say that this requirement is "too hard" or that it is frivolous since the new licensee will likely not use the mode. If the license class permits the use of CW, then the applicant must prove proficiency in the use of that mode. This is the very basis for all amateur testing and it should not be removed based on the popularity of the mode, or based on how many years that the mode has been in use.